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February 23, 2023

**VIA ECF FILING**

The Honorable Nicholas G. Garaufis  
The Honorable Marcia M. Henry  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: In Re: Exactech Polyethylene Orthopedic Product Liability Litigation (E.D.N.Y. Case No. 1:22-md-03044-NGG-MMH)**

Dear Judge Garaufis and Magistrate Judge Henry:

We write on behalf of TPG Inc. (“TPG”) (without waiver of service and other defenses). As Your Honors are aware, Plaintiffs filed a Master Complaint on Thursday, January 26, 2023, which in addition to Exactech, Inc. and Exactech U.S., Inc. (the “Exactech Defendants”) names seven defendants -- four that are referred to as entities with the TPG name, and three with the Osteon name -- a number of whom are unincorporated associations (LLC and LP entities). Pursuant to Case Management Order No. 1, Plaintiffs were to submit a Short Form Complaint by February 2, 2023, which the Court has twice extended, with a current deadline of today, February 23.

In light of the naming of these many entities, TPG has now retained additional counsel from another law firm who will be filing their appearances with the Court and negotiating with Plaintiffs’ counsel the terms of the Short Form Complaint (as well as a proposed amended Direct Filing Order). To enable new counsel to do so, TPG respectfully requests an additional extension for the filing of a Short Form Complaint, up to and including March 16, 2023. Plaintiffs’ Co-Lead Counsel as well as the Exactech Defendants consent to this request.

We greatly thank the Court for its understanding and consideration.

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Respectfully submitted,

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